

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

In Re:

**BELLAMY W. BROWN,
Debtor.**

CHAPTER 13

CASE NO. 13-11382-BFK

NOTICE

PURSUANT TO THE FEDERAL FAIR DEBT COLLECTION PRACTICES ACT, WE ADVISE YOU THAT SAMUEL I. WHITE, P.C., COUNSEL FOR THE PLAINTIFF, IS A DEBT COLLECTOR ATTEMPTING TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION WE OBTAIN FROM YOU WILL BE USED FOR THAT PURPOSE.

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, USAA Federal Savings Bank, by Counsel, and Objects to the Confirmation of the Chapter 13 Plan, and in support thereof, represents unto the Court:

1. That USAA Federal Savings Bank has a validly perfected security interest in a 2001 Volvo S60, VIN: YV1RS58D812048691 pursuant to a valid Note, Disclosure, and Security Agreement dated July 26, 2011.
2. That the principal balance and accrued interest is \$7,166.83 as of March 27, 2013 with interest accruing at 14.44%.
3. According to the NADA Values for March, 2013, the retail value is \$5,975.00.
4. That the Plan is objectionable as it states that this Secured Creditor will be crammed down to a value of \$3,000.00 and reduced interest of 4.50%.
5. That post-petition attorneys fees have been incurred for the preparation and filing of a Proof of Claim, and additionally \$250.00 for the preparation and filing of the Objection to Confirmation herein.

WHEREFORE, the undersigned requests that the Confirmation of the Chapter 13 Plan as proposed, be denied.

USAA FEDERAL SAVINGS BANK

By: /s/ MICHAEL T. FREEMAN

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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing Objection was mailed this 17th day of April, 2013 to Thomas P. Gorman, Trustee, 300 North Washington Street, Suite 400, Alexandria, VA 22314; Jeremy Calvin Huang, Esquire, Counsel for Debtor, 7753 Inversham Drive, Apt 228, Falls Church, VA 22042; and Bellamy W. Brown, Debtor, 3922 10th Street, NE, Apt. 4, Washington, DC 20017.

/s/ MICHAEL T. FREEMAN
Samuel I. White, P. C.